

DOA: 6/30/25

UNITED STATES DISTRICT COURT**DISTRICT OF ARIZONA**

United States of America

v.

Lamar Darnell Dunlap

Case No.: 25-6250MJ

**CRIMINAL COMPLAINT
(Electronically Submitted)**

I, the undersigned complainant, being duly sworn, state that the following is true and correct to the best of my knowledge and belief:

COUNTS 1-4

On or about the dates below, in the District of Arizona and elsewhere, Defendant Lamar Darnell Dunlap, did knowingly receive a visual depiction that involved the use of a minor engaging in sexually explicit conduct and such visual depiction was of such conduct. The visual depiction had been mailed, had been shipped and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and had been produced using materials which had been mailed, shipped, and transported by any means, including by computer, and did attempt to do so. Some files received include:

Count	Date	Files
1	June 29-30, 2024	File ending in 7446-y.jpg
2	October 5, 2024	IMG_4183.MP4 IMG_4184.MP4
3	November 4, 2024	5855116335230490085-4.mp4
4	November 10, 2024	IMG_4686.MOV Video(2).mp4 IMG_4688.MOV

All in violation of Title 18, United States Code, Section 2252(a)(2), (b)(1), and 2256. See Attachment A

COUNT 5

On or about June 30, 2025, in the District of Arizona and elsewhere, Defendant Lamar Darnell Dunlap, knowingly possessed and knowingly accessed with intent to view visual depictions that involved the use of a minor engaging in sexually explicit conduct and such visual depictions were of such conduct. The visual depictions possessed by Defendant included a prepubescent minor and a minor under the age of 12. The visual depictions had been shipped, or transported using any means or facility of interstate or foreign commerce or in and affecting interstate or foreign commerce, and had been produced using materials which had been mailed, shipped, or transported by any means, including by computer. Some of the visual depictions of minors engaged in sexually

explicit conduct include: VID_20170724_234006.mp4;
VID_20231212_215135_779.mp4; VID_20240917_105053_361.mp4;
VID_20231128_105610_858.mp4.mov; and VID_20231128_110807_501.mp4.

All in violation of Title 18, United States Code, Section 2252(a)(2), (b)(1), and 2256. See Attachment A

I further state that I am a Special Agent from HSI and that this complaint is based on the following facts:

See Attached Statement of Probable Cause Incorporated By Reference Herein.

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No

AUTHORIZED BY: s/Gayle L. Helart, AUSA

Gayle L. Helart

Digitally signed by GAYLE
HELART
Date: 2025.07.01 07:34:45
-07'00'

Nathan K. Foster, Special Agent, HSI

Name of Complainant

NATHAN K FOSTER

Digitally signed by NATHAN K
FOSTER
Date: 2025.07.01 07:01:30 -07'0

Signature of Complainant

Telephonically Sworn to and subscribed

July 1, 2025@8:49am

Date

at

Phoenix, Arizona

City and State

HONORABLE Alison S. Bachus

United States Magistrate Judge

Name & Title of Judicial Officer

Al

Signature of Judicial Officer

Attachment A

Statutes

Counts 1-4: Knowingly Receiving Child Pornography. It is a violation under 18 U.S.C. § 2252(a)(2) to either knowingly receive a visual depiction that involved the use of a minor engaging in sexually explicit conduct and such visual depiction was of such conduct. The visual depiction in this case had been mailed, had been shipped and transported using any means and facility of interstate and foreign commerce, i.e. the internet, and in and affecting interstate and foreign commerce, and had been produced using materials which had been mailed, shipped and transported by any means, including by computer.

A violation of 18 U.S.C. § 2252(a)(2), (b)(1), and 2256 is punishable by 5-20 years, \$250,000, and between 5 – lifetime supervised release.

Count 5: Knowingly Possessing Child Pornography. It is a violation under 18 U.S.C. § 2252(a)(4)(B) to knowingly possess and knowingly access with intent to view, visual depictions that involve the use of a minor engaging in sexually explicit conduct when such visual depictions depict such conduct, and had been shipped or transported using any means or facility of interstate or foreign commerce or in and affecting to either knowingly receive a visual depiction that involved the use of a minor engaging in sexually explicit conduct and such visual depiction was of such conduct. The visual depiction in this case had been mailed, had been shipped and transported using any means and facility of interstate and foreign commerce, i.e. the internet, and in and affecting interstate and foreign commerce, and had been produced using materials which had been mailed, shipped and transported by any means, including by computer. Some of the visual depictions were of a minor under age 12.

A violation of 18 U.S.C. § 2252(a)(4)(B), (b)(2), and 2256 is punishable by 0-20 years, \$250,000, and between 5 – lifetime supervised release.

ELECTRONICALLY SUBMITTED STATEMENT OF
PROBABLE CAUSE

I, Nathan Foster, Special Agent (SA) with Homeland Security Investigations (HSI), being duly sworn, depose and state as follows:

INTRODUCTION

The facts of this case, as more fully detailed herein, are that on June 17, 2025, HSI Casa Grande (hereafter HSI CAG) received information from HSI London that a United Kingdom subject, who had been arrested for sexually abusing his daughter, had also been in communication with Telegram Messenger user -6232579658, aka "Gibby," where the two had exchanged messages involving their mutual interest in sexually abusing children and had also engaged in trading child pornography files through Telegram for nearly six month period from at least June 18, 2024 – December 2, 2024. Investigative steps determined that Telegram Messenger user -6232579658, aka "Gibby", to be Lamar Darnell Dunlap residing in Pinal County. HSI Agents executed search warrants on Dunlap's residence, person, and vehicle on Monday June 30, 2025. Dunlap was interviewed and made admissions that he was Gibby, that he talked with the United Kingdom offender, and that he had received child pornography from the United Kingdom offender. During the search warrant, several devices were seized and so far, the forensic agent has determined that Dunlap possessed child pornography on his devices, including illegal files showing the UK offender's daughter engaged in sex acts.

PRELIMINARY BACKGROUND INFORMATION

1. I am a SA with HSI assigned to the Resident Agent in Charge (RAC) office, in Casa Grande, Arizona. I have been a SA with HSI since July 2017. During my time as a SA, I have been assigned to a variety of investigations including human smuggling, bulk cash smuggling, weapons smuggling, narcotics trafficking, labor exploitation, and most recently crimes against children. I am currently assigned to the Illicit Trade Travel and Finance (ITTF) Group which conducts investigations involving crimes against children, including the possession, distribution, and production of child pornography. I have

1 received formal training regarding the investigation of cases involving the sexual
2 exploitation of children. As part of these investigations, I have reviewed examples of child
3 pornography images and videos, and I am familiar with the definition of child pornography
4 pursuant to 18 U.S.C. § 2256. I am also familiar that child pornography is also referred to
5 as Child Sexual Abuse Material (CSAM).

6 2. The purpose of this application is to set forth probable cause for the arrest of
7 Lamar Darnell Dunlap for the violations of 18 U.S.C. §§ 2252(a)(2) which makes it a crime
8 to knowingly receive child pornography; and 2252(a)(4)(B), which makes it a violation to
9 possess, or knowingly access with intent to view, child pornography.

10 **STATUTORY AUTHORITY**

11 3. This investigation concerns alleged violations of Title 18, United States
12 Code, Section 2252 related to material involving the sexual exploitation of minors.

13 a. 18 U.S.C. § 2252(a)(2), in summary, prohibits a person from
14 knowingly receiving a visual depiction if the producing of such visual
15 depiction involved the use of a minor engaging in sexually explicit conduct
16 and such visual depiction was of such conduct, using any means of interstate
17 commerce, including by computer.

18 b. 18 U.S.C. § 2252(a)(4)(B), in summary, prohibits a person from
19 knowingly possessing or accessing with intent to view, any matter which
20 contains any visual depiction if the producing of such visual depiction
21 involved the use of a minor engaging in sexually explicit conduct and such
22 visual depiction was of such conduct, that has been transported using any
23 means or facility of interstate commerce, including by computer.

24 **BACKGROUND ON TELEGRAM APPLICATION**

25 4. Telegram is a cloud-based instant messaging application known for its focus on
26 speed and security. It allows users to send text messages, voice messages, photos, videos,
27 and files of any type.
28

1 5. Telegram offers end-to-end encryption for its "Secret Chats" feature, meaning only
2 the communicating users can read the messages. Regular chats are encrypted between the
3 client and the server.

4 6. Telegram stores user data, including contact lists, messages, and media, on its
5 servers. However, due to its encryption policies, accessing certain types of data may be
6 challenging without user consent.

7 7. Telegram is used globally and has been known for its use by various groups,
8 including those involved in criminal activities due to its security features.

9 8. Telegram also supports file sharing of up to 2GB per file, which can include
10 images, videos, and other media types. In prior investigations, Telegram has been identified
11 as a platform used to share exploitative material, including child sexual abuse material
12 (CSAM), due to its encryption features, anonymous user capabilities, and the ability to join
13 or follow private or invite-only groups and channels.

14 **DETAILS OF THE INVESTIGATION**

15 9. In the following investigative details, all initials, subject reference, and redacted
16 DOB's references refer to persons and dates that are known to law enforcement.

17 10. On June 17, 2025, HSI CAG received the following information from HSI
18 London and a foreign law enforcement agency (FLA). On or about June 16, 2025, an
19 officer from the United Kingdom (UK) based Northwest Regional Organized Crime Unit
20 (NWROCU) contacted HSI London to provide an intel lead in reference to Telegram user
21 - 6232579658 aka "Gibby" who appeared to be a US based target located in Florence,
22 Arizona. Gibby had been in contact with a UK based offender who was later identified as
23 a producer abusing his own children and has been arrested. During the chats with the UK
24 offender, Gibby claimed to be living in Arizona with a wife, who he named to the UK
25 offender and who is Dunlap's actual wife's name, and three minor relatives to whom he
26 has regular contact. During chats between Gibby and the UK offender, Gibby spoke of his
27 sexual interest in children and wanting to sexually abuse his minor relatives. Gibby and
28

1 the UK offender chatted for a period of at least June 18, 2024 – December 2, 2024, for
2 which the UK law enforcement officers had records. During this time, Gibby had received
3 image and video files of child sexual abuse materials (CSAM), and the context of the chats
4 suggested Gibby had also distributed illegal and/or child exploitative materials as well.
5 The information included that the UK offender sent Gibby several first-generation videos
6 now confirmed to be of the UK offender sexually abusing his daughter, to include sexual
7 intercourse and oral sex with her. Gibby commented positively on the videos, including
8 that he wanted to have sexual contact with his own minor relatives and in some cases
9 described what he wanted to do to them. Gibby distributed several personal files showing
10 his wife and these minors (clothed) to the UK offender. From these files, HSI London
11 tentatively identified the target of this investigation as Lamar Darnell Dunlap (DOB:
12 XX/XX/1982—full DOB known to me) who resides at a specific address, which I know,
13 which is in Pinal County, Arizona. HSI London came to this conclusion based on the
14 following facts:

- 15 • Dunlap’s account on Instagram followed the UK offender on Instagram. Dunlap’s
16 profile on Facebook was a “friend” of the UK offender on Facebook.
- 17 • There is a female with the same name residing at the same home address in Pinal
18 County as Dunlap, and Gibby called her this same name to the UK offender.
- 19 • There is an online “furry” profile¹ “Gibson the Mouse” associated with the user Gibby
20 on Telegram. The person identifying as “Gibson the Mouse” stated in his online video that
21 his real name is Lamar. [AGENT’S NOTE: When I used the search term “Gibson the
22 Mouse” on a Google search, I located a video on Buzzfeed titled “Day in the Life of a
23 Furry.” The first sentence of the video is “My name is Lamar but people in the furry
24 fandom call me Gibson the Mouse.” He then explains what he does such as wake up,
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26
27 1 I am familiar that a “furry” generally refers to a person who is interested in a subculture that attributes
28 human characteristics to animals and who dresses like the animal they want to be. Furies often
participate in online communities together but also participate in in-person conventions where they can
wear their fur costumes and participate in activities and entertainment.

brushes his teeth, and brushes his furry hair, and he explains that he has a friend who is a teacher and he gets to go to her class and read a book to them.]

- The image of the persona of “Gibson the Mouse” is a match to the Arizona Driver’s License for Lamar Darnell Dunlap (DOB: XX/XX/1982).
- The email address associated with Dunlap’s wife indicates she may be a teacher because of the name. [AGENT’S NOTE: The wife’s employment records also show she worked for Chandler Unified School District in an unknown capacity.]
- The review of the Facebook account for Dunlap’s wife show she has access to the same minors as Dunlap.

11. On or around June 18, 2025, HSI London provided HSI Casa Grande with nearly six months of chat communications between Gibby and the UK offender, which I have reviewed. The chat communications ranged from June 18, 2024, to December 2, 2024. I noted the following examples of communications supporting identification of Gibby to being Dunlap, and to knowingly receiving and possessing child pornography in the chat communications between Gibby and the UK offender on Telegram:

Receiving Child Pornography

12. With respect to Gibby knowingly receiving child pornography, a few examples include:

June 29-30, 2024

Gibby: Do you think you can resend the father’s day vids you took. I missed those when the last secret chat closed.

UK Offender: Of course!

UK Offender: (Sends a video which I cannot see, but also sends an image ending in 7446-y.jpg. This image shows a minor age female lying on her back. Closeup of her vagina. There is a white substance dripping out. An adult male penis is in the foreground of the picture.)

Gibby: Mmmmm thank you!!!!

1 **Gibby:** Hearing you say “come sit on it baby” best sentence ever

2 **UK Offender:** Hehehehe

3 **UK Offender:** She was so pleased and proud of herself afterward and said it felt so good
4 being fully inside her.

5 **Gibby:** Such a good girl

6 **Gibby:** Did you get any pics of the creampie. Is love to clean her up hehe

7 **UK Offender:** Not this time, I was too busy continuing to fuck her! x3

8 **Gibby:** Good pedo

9
10 *October 5, 2024*

11 **UK Offender:** (Sends two videos, one of which is called IMG_4183.MP4. This file is a
12 color video approximately 29 seconds in length. The video shows a female masturbating
13 to a video playing on her phone. The video being played is an infant laying faceup on the
14 lap of an adult male. The adult male is forcing the infant to perform oral sex on his erect
15 penis. The video zooms in on the infant being forced to engaged in oral sex. The adult male
16 is holding the child’s head forcing his penis in and out of the infant’s mouth. The other
17 video called IMG_4184.MP4 shows what appears to me to be a 13-16 year old girl
18 masturbating to a computer desktop screen that is playing a video of a 5-8 year old female
19 giving oral sex to an adult male’s penis.)

20 **UK Offender:** Going ok thanks. Today has been fairly chill with not much done tbh

21 **Gibby:** Nice, glad you are relaxing. Loved the vids hehe

22
23 *November 4, 2024*

24 **UK Offender:** (Sent secret-file-5855116335230490085-4.mp4. This file is a color video
25 approximately 59 seconds in length. The video starts by showing a girl, who appears to be
26 approximately 8-10 years old, standing in front of an adult male who has his erect penis
27 exposed. The girl performs oral sex on the man’s penis. At approximately 31 seconds, the
28 video shows three completely nude prepubescent girls taking turns standing in front of an
adult male performing oral sex on his erect penis. The females appear to be approximately

6 to 10 years of age. AGENT'S NOTE: The girls appear to be African American and Dunlap and his minor relatives also appear to be African American, relevant only for the further comment they make.)

Gibby: Loved the way her sister made her deep throat his cock. Wish my (relatives) were that eager to suck (my) cock

UK Offender: I loved that moment too and immediately thought of your (relatives)

Gibby: I'm glad you think of my (relatives) hehe

Gibby: I wish I kept the vids I used to have

UK Offender: Which vids did you have?

Gibby: The vids of me grinding between (Minor relative's name) cheeks and cumming.

Gibby: It felt good typing that hehe

UK Offender: Fuck yes, you naughty (Gibby)

November 10, 2024

UK Offender: (Sent Attachment video.mp4. This file is a video of UK offender sitting with an identified UK female victim who appears approximately 12 to 14 years old. The female is waving her hand and saying hello.)

Gibby: She's soooo cute

Gibby: Hello cutie

UK Offender: (Sent Image IMG_4687.MOV)

UK Offender: (Sent IMG_4686.MOV. This file is a color video of the UK offender receiving oral sex from the identified UK child victim.)

UK Offender: She says it's ok to send you these ;3

Gibby: Mmmm thank you so much for sharing those with me. You are so beautiful.

UK Offender: Aw she's smiling now

Gibby: My day at work is so much better now. I'm so hard right now.

UK Offender: She's glad

1 **UK Offender:** She said it's sad that you don't get to have sex with your (minor relatives)
2 but you can fuck her instead

3 **Gibby:** I agree. I would love to fuck you. You're so sexy. Maybe you can convince my
4 (minor relatives) that having sex with (me) would be amazing

5 **UK Offender:** We should definitely get them all telegram

6 **Gibby:** I'll install for my (relatives) tonight

7 **Gibby:** I think it will be good to have friends across the world

8 **UK Offender:** (Sent video(2).mp4. This is a color video of identified UK child victim
9 saying what appears to be "hello Lamar" while she rubs her breasts then performs oral sex
10 on the UK offender.

11 **Gibby:** That was amazing. My name sounds sweeter coming from her lips

12 **UK Offender:** She's genuinely excited

13 **UK Offender:** (Sends IMG_4688.MOV. This is a color image of the identified UK child
14 victim appearing to me to be being anally penetrated by the UK offender. The focal point
15 of the video is on the female's back and buttocks as the adult male penetrates her anus with
16 his erect penis.)

17 **UK Offender:** I slapped her ass then we got interrupted xD

18 **Gibby:** Such a nice spankable bottom. Your cock looks good between her cheeks

19 **Gibby:** Such a good sound too. Perfect bottoms make the best sound when spanked.

20 **UK Offender:** I enjoyed it very much

21 **Gibby:** I can't wait to enjoy it properly. It's so hot knowing your little girl knows my
22 name.

23 **Possessing Child Pornography**

24 13. With respect to Gibby possessing child pornography, I noted the following
25 conversation on July 14, 2024, where Gibby discusses his "drives" where explicit photos
26 were stored:
27
28

1 **Gibby:** I really enjoy watching the pool changing room vids. I came so hard when (UK
2 daughter's name redacted) got on her knees like a good girl to suck your cock properly

3 **UK Offender:** Mmm I remember that very fondly, Was such a hot experience to do it
4 with other people around

5 **UK Offender:** Have you still got the one we did outdoors?

6 **Gibby:** I should have it. Shall I send it once I find it?

7 **UK Offender:** Yes please!

8 **Gibby:** It's not on my smaller drive. I'll check the bigger one in the morning. Gonna get
9 some sleep and hopefully have peevy dreams hehe

10 **UK Offender:** Ok lovely, sleep well!

11 ...

12 **UK Offender:** (Sends several videos / image files).

13 **Gibby:** Wow, glad to wake up to these"

14 **Gibby:** I searched both of my drives. I could not find the outside video **UK Offender:**
15 Aw never mind. Thanks for looking!

16 **Gibby:** Hopefully I'm just over looking it, I'll gladly watch every video of you guys again
17 to find it hehe

18 **Gibby:** You've turned me into such a Pedo.....thank you.
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20 **Identification of Dunlap**

21 14. I accessed Dunlap's Arizona Motor Vehicle Department records and saw this
22 record:
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15. Then, as part of a Google search for Gibson the Mouse, and prior to the execution of the search warrants, agents located an open-source video titled “Day In The Life Of A Furry,” in which Dunlap is seen wearing and caring for his Gibson the Mouse costume. Two screenshots from the video are below:



16. In the chats, I noted the following corroborating statements that Gibby was Dunlap:

November 4, 2024

Gibby sent UK offender a picture of a tattoo on a man's lower leg whose skin appears to be an African American male, that showed a Samurai sword with the name Carlos Dunlap inside dog tags, which are wrapped around the Samurai sword. Gibby wrote

1 “Tattoo my friend gave me for my dad.” An internet search for Carlos Dunlap shows that
 2 he passed away on October 21, 2024. I also noted a chat on October 22, 2024, where
 3 Gibby stated to the UK offender, “my dad has passed away.” In response, UK offender
 4 said, “Oh Lamar, I’m so sorry. I hope you’re ok...”

5 *November 10, 2024*

6 I noted the video “video(2).mp4” (also described above) showing the UK offender’s
 7 daughter who said “hello Lamar” with Gibby responding how he liked when she said his
 8 name.

9 *Miscellaneous dates where Gibby mentions his wife’s name*

10 On several dates, Gibby refers to his wife’s name, i.e. “(Redacted Name) just asked
 11 me if I liked young girls” (August 15, 2024); “While driving home today, (Wife) and I saw
 12 a girl about 10 wearing a dress with her legs wide open. After about a minute she asked
 13 me what color the girls panties were. I quickly said ‘black and white stripes’ she then said
 14 you’re such a pedophile” (September 21, 2024); and “Now that I think about I think (Wife)
 15 sent you a voice message calling you a pedo on your birthday last year (September 30,
 16 2024).

17 The investigation has uncovered Facebook pages, one each for Lamar and (Wife)
 18 Dunlap, where they have pictures of the other of them, and the children to which they have
 19 access which Gibby refers to in his chats.

20 *Miscellaneous dates where Gibby mentions his minor relatives’ names*

21 Gibby mentions his minor relatives by name (referred to here as Minor 1 and Minor
 22 2) on a few occasions in the chats, which are consistent with the names on the Facebook
 23 pages of both Lamar and (Wife) Dunlap and consistent with their ages.

24 I noted the following few examples of chats with their names and which also
 25 corroborates his sexual interest in them.

26 *November 4, 2024:*

27 **UK Offender:** Which vids did you have?
 28

1 **Gibby:** The vids of me grinding between (Minor 1's) cheeks and cumming

2 *August 2, 2024*

3 **Gibby:** (Sends file ending in 3244-y.jpg which shows anime cartoon of two minor
4 females, with one bent over with her bottom and vagina showing and the other girl
5 spreading the girl's butt cheeks, with the caption reading "It's okay to be a
6 pedophile—shoot your pedo cum here" with a circle around the vagina with the girl
7 bent over. A caption below the vagina says "You want child pussy.")

8 **UK Offender:** Mmm she's a good girl!

9 **UK Offender:** Which of your (Relatives) do you wish that was?

10 **Gibby:** Mmmmm definitely (Minor 2).

11 *August 28, 2024*

12 **Gibby:** Hey there, we are ok. (Redacted Wife's Name) is a bit depressed
13 unfortunately. (Minor 1) is cutting herself and work is super busy

14 *August 29, 2024*

15 **Gibby:** "(Minor 2) said 'this candy just came in my mouth' I was hard instantly"

16 *October 8, 2024*

17 **Gibby:** (Sends two images ending in 4246-1.jpg and 4374-1.jpg. They show Minor
18 1 wearing black shorts and a black fishnet top), where he states, "New (Minor 1's)
19 new outfit." This appears to be Minor 1 based on the publicly available pictures on
20 Lamar and (Wife)'s Facebook pages.

21 17. Open source and records checks indicate that Lamar Dunlap is married to (Wife)
22 and that they currently reside at an address in Pinal County.

23 18. Open source checks show Lamar Dunlap and his wife have public Facebook
24 profiles. In observation of these profiles, the persona "Gibson the Mouse" is observed
25 directly linked to Dunlap and three minors consistent with who he discusses are observed.
26

27 19. HSI CAG agents also located a Tiktok video associated to Dunlap where Dunlap
28 describes the routine of the persona "Gibson the Mouse" and where Dunlap says he dresses

1 as the p ersona and reads books to children at schools. Dunlap's wife appears to have been
2 an employee of the Chandler Unified School District.

3 20. Further, I noted two instances where I could compare the background details of
4 two pictures of people that looked to be taken inside of his residence that Gibby sent to the
5 UK offender. I compared the background details as compared to Dunlap's residence as
6 they were posted on Redfin, a real estate company that provides services to both buyers
7 and sellers, and includes having photos of inside and outside views of homes that are
8 available for public viewing on the internet. For example, on October 8, 2024, I noted that
9 one of the pictures of a family member appeared to be in a living room, and it visually
10 matched the Redfin living room pictures. And, on November 5, 2024, Gibby sent a picture
11 of a family member that appeared to be leaning over a square brown wood table in a
12 kitchen. The kitchen details with white and gray countertops and light brown wood
13 planked floors appeared the same as on the Redfin website.

14 ***Further Probable Cause from Date of Search Warrant***

15 21. On June 27, 2025, I received search warrants (which remain sealed, numbered
16 5320MB, 5321MB, 5322MB) to search Lamar Darnell Dunlap's residence, vehicle, and
17 person, at an address in Pinal County, Arizona for computers, cellular telephones, and
18 electronic storage devices for evidence of child pornography activities.

19 22. On June 30, 2024, HSI agents and Pinal County Sheriff's Office members
20 executed the search warrant at Darnell's residence in Pinal County. Dunlap was present
21 along with family members. Agents located and seized 16 electronic devices, including
22 three cell phones, two laptop computers, one tablet, one hard drive, six USB drives, one
23 SD card, one digital camcorder, and several DVDs. Agents also located and photographed
24 Dunlap's Gibson the Mouse furry costume which was located in his master bedroom and
25 closet.
26

27 23. During the execution of the search warrant, agents interviewed Dunlap and his
28 wife. Dunlap was advised of his *Miranda* rights. He admitted to being a furry using the

moniker "Gibson the Mouse." Dunlap also admitted to using the messaging application Telegram to communicate with people to discuss explicit topics, including the sending and receiving of child pornography.

24. Dunlap admitted to chatting with a subject from the United Kingdom, whom he knew as Dan, who sent Dunlap sexually explicit files depicting the sexual abuse of Dan's 11-year-old daughter. Dunlap said he had known Dan for about seven years, and they have sent care packages containing food to each other. Dunlap stated he had also sent Dan's daughter a birthday present. Dunlap described these files as depicting vaginal and oral sex between Dan and the 11-year-old girl. Dunlap denied that any of these files aroused him, though he admitted to having masturbated to them a few times stating, "It's more so the, the um, I guess the taboo nature of it than anything, I mean, but yes, I'm gonna say I probably have." Dunlap stated he did not recall the video by Dan's daughter where she stated, "Hi Lamar" before performing oral sex but added, "If it's there, I'm gonna assume that it happened." Dunlap also admitted to having sent child pornography files to Dan via Telegram explaining that he had forwarded files of child pornography from other Telegram groups he was in.

25. Agents read Dunlap several of the Telegram messages between he and Dan. Dunlap stated, "These are my words, but just like with most people on the Internet, most things that come out of our mouths are just lies for clout, or lies to fit in, or just lives, to kinda, not lives, lies to make things interesting, but not any truth to them." Dunlap denied ever having sexually abused his own minor age relatives.

26. Dunlap admitted to having used the name "Gibby" on Telegram stating, "Yes...some people call me Gibby, so I think I may have used that shortly [on Telegram]." Dunlap stated he deleted his Gibby profile and he now used a different username "Cassie Perrie."

27. During the interview, Dunlap stated essentially that "you guys (meaning the police) will be back because (wife) is gonna murder me." He added that his mom would

1 help bury the body. He stated that his wife would stab him if he ever did anything to the
2 kids. He later expressed concern for his wife's mental state, stating that she would kill
3 herself. Dunlap said, "If she dies, I'll die." Dunlap made other statements about self-harm
4 including wanting to scratch the tattoo off of his arm/wrist and bleed out. He recanted
5 quickly and said "I keep saying things that...strike that from the record. I'm not a suicide
6 risk. Um, I'm definitely worried about (wife) especially if she has to spend the night
7 alone."

8 28. Dunlap's wife was interviewed. She confirmed using Telegram and knew of
9 Dunlap's relationship with Dan. She stated that Dunlap and Dan were online friends and
10 had talked for awhile. She knew that Dan called himself a pedophile but claimed he had
11 never harmed children and she believed him. Dunlap's wife recalled that as a birthday gift
12 to Dan, she recorded a voice message to him saying "Happy Birthday you Pedophile."
13 Dunlap's wife knew Dunlap had created a chat group on Telegram named Cassie for a
14 character that he created. She recalled that Dunlap told her that he was in other Telegram
15 chat groups in which a lot of users distributed child pornography.

16 29. The forensic review remains ongoing. So far, the forensic review has revealed
17 at least 100 child pornography files on at least eight of the seized devices. The majority of
18 the files appear to show girls who appear between ages 8-12 years old, however, other
19 illegal files depicting younger and older minors were also located. The preliminary
20 forensic examination also revealed the presence of numerous child pornography files
21 depicting the UK offender's minor daughter engaged in a variety of illicit poses and sex
22 acts including oral sex. Some examples of child pornography Dunlap possessed on four
23 different items include:

24 **VID_20170724_234006.mp4:** This is a color video approximately 19
25 seconds in length showing a completely nude girl who appears to be
26 approximately 8 to 10 years of age. She is lying face up on a bed, legs
27
28

1 spread, genitals exposed. An adult male is engaged in sexual
2 intercourse with her. (On Samsung Galaxy Note II)

3 **VID_20231212_215135_779.mp4:** This is a color video showing a
4 fully clothed girl who looks to be approximately 6-8 years old. An
5 adult man is sitting in a chair with his erect penis exposed. The girl
6 then performs oral sex on the adult man's penis. (On Samsung Galaxy
7 S21 Ultra)

8 **VID_20240917_105053_361.mp4:** This is a color video file of a
9 camera facing towards a bed. The video is a collage of sex acts between
10 and adult male and adult female. During the sex acts a boy who appears
11 to be approximately 6 to 8 years old of age is shown. The boy watches
12 them, and then at approximately 03:52, the boy is shown nude from the
13 waist down with his legs spread, genitals exposed. The boy watches the
14 adult man and woman engage in sexual intercourse. (On SanDisk USB
15 SDDDC3)

16 **VID_20231128_105610_858.mp4.mov:** This file is a color video
17 approximately 45 seconds in length. The video shows one of the
18 identified UK child victims performing oral sex on an adult male's
19 penis. An adult male is shown sitting with his erect penis exposed while
20 the UK child victim is kneeling in between the adult male's legs
21 performing oral sex his erect penis. This girl appears approximately 11
22 to 12 years of age. The second identified UK female victim is shown
23 watching the sex act, the second identified UK victim appears
24 approximately 4 to 5 years of age. Age is estimated based on facial
25 features and size. (On SanDisk Cruizer USB)

26 **VID_20231128_110807_501.mp4:** This file is a color video
27 approximately 1 minute and 22 seconds in length. The file shows one
28

1 of the identified UK child victims wearing only a diaper who appears
2 4-5 years old. The girl is shown sitting on a bed beside an adult male
3 with his erect penis exposed. The female is shown masturbating and
4 licking the adult male's erect penis. Age is estimated based on facial
5 features, size, and breast development. (SanDisk Cruizer USB)

6 30. Dunlap was arrested for receiving and possessing child pornography on June 30,
7 2025.

8 **CONCLUSION**

9 31. Based on the foregoing, I believe that there is probable cause that Lamar Darnell
10 Dunlap knowingly received child pornography in violation of 18 U.S.C. §§ 2252(a)(2),
11 (b)(1), and 2256, and knowingly possessed child pornography in violation of 18 U.S.C. §§
12 2252(a)(4)(B).

13 Respectfully submitted,

14 NATHAN K FOSTER

Digitally signed by NATHAN K
FOSTER
Date: 2025.07.01 07:02:31 -07'00

15 Nathan Foster
16 Special Agent
Homeland Security Investigations

17
18 Subscribed and telephonically sworn before me this 1st of July, 2025.

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21 HONORABLE ALISON S. BACHUS
22 United States Magistrate Judge
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